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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Preparation for International  
Telecommunication Union World  
Radiocommunication Conferences

ET Docket No. 93-198

COMMENTS OF COMSAT WORLD SYSTEMS

COMSAT World Systems, a business unit of COMSAT Corporation (CWS), herein submits its comments on the Notice of Inquiry (Notice) in the above-captioned proceeding.

Introduction

Pursuant to the Final Acts of the Additional Plenipotentiary Conference (APP) held in Geneva in December 1992, the new ITU Constitution and Convention implemented a regular two-year cycle of WRCs which will replace the past practice of holding World Administrative Radio Conferences (WARCs) on an ad hoc basis. CWS believes that this regular two-year cycle of WRCs will provide

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far better planning and preparation, and should, as the Commission notes, reduce pressure to include too many items on the agendas of the early WRCs.<sup>1</sup>

Although WRC-93 is scheduled to begin on November 15, 1993 in Geneva, it will not take actions to modify the International Table of Frequency Allocations or any other part of the ITU Radio Regulations (Radio Regulations). Rather, WRC-93 will recommend specific items to be included on the agenda of the 1995 WRC, and identify other items to be included on the agendas for the 1997 and future WRCs.<sup>2</sup> As a related matter, to assist in the formulation of coherent telecommunications policies, meetings of the Radio Communication Assembly will be associated with WRC-93 and future WRCs. The first Radiocommunication Assembly will meet the week prior to WRC-93 in Geneva beginning November 8, 1993. The Radiocommunication Assemblies will replace the CCIR Plenary Assemblies under the old ITU structure.

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<sup>1</sup> Notice, at n.8.

<sup>2</sup> COMSAT also emphasizes the importance of the Radiocommunication Assemblies to future WRCs, since most of the technical studies supporting decisions taken at WRCs will be undertaken in the Radiocommunication Sector of the ITU and considered at subsequent Radiocommunication Assemblies. In turn, the reports of the Assemblies will be submitted to the WRCs. Therefore, looking ahead at issues which should be included on the agendas for future WRCs, it is important to ensure that U.S. preparation for the Assemblies includes consideration of the appropriate technical issues and studies necessary to support U.S. proposals and positions at future WRCs.

### Specific FSS issues for WRC-95

In addressing the Notice from the standpoint of a major global Fixed Satellite Service (FSS) operator, CWS does not generally foresee a need to include FSS issues as major agenda items for WRC-93 or WRC-95. We agree with the Commission that the two agenda items already designated by the APP-92 and the ITU Council for consideration at WRC-95 -- the report of the Voluntary Group of Experts (VGE) and consideration of the MSS bands that were allocated at WARC-92 -- constitute a substantial workload.<sup>3</sup> Accordingly, CWS is today confining its comments to these two issues.

### The Report of the VGE

The Notice broadly describes the tasks given to the VGE to study and make recommendations on ways to simplify the Radio Regulations.<sup>4</sup> This international Group of Experts has been undertaking this particularly difficult task since its formation by the Administrative Council in 1990. WRC-93 will be the first opportunity for all ITU Members to receive a status report on the work of the VGE.

As the Commission points out in its Notice, U.S. interested

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<sup>3</sup> Notice, at n.8.

<sup>4</sup> See Id. at ¶4.

parties will have an opportunity to comment on the VGE's recommendations in preparing for WRC-95.<sup>5</sup> Any recommendations by the VGE to simplify or alter the Radio Regulations will receive the most careful review from all Administrations and parties whose successful use of the radio frequency spectrum depends upon

A clear program and schedule for educating all Members on the VGE recommendations should be established at an early date. The expectation of success at WRC-95 will be improved if Members are informed and have an opportunity to understand the implications of any proposed changes to the Radio Regulations;

Consider presenting proposed changes in small, section-by-section pieces, which could be considered serially and be the subject of agenda items at the appropriate 1995, 1997 and 1999 WRCs.

We believe that these recommendations, if implemented, would assist in the review process and improve the chances for successful consideration of the VGE's recommendations. CWS will comment on specific VGE proposals, at a later date in this proceeding.

The use of MSS Feeder-links using the FSS Frequency Bands.

The ITU Council has recommended that WRC-93 include on the agenda for WRC-95 specific guidance for facilitating the use of frequency bands allocated to the MSS worldwide. The Commission believes that therefore WRC-93 presents an opportunity for the U.S. to advocate resolution of issues affecting use of these bands and satellite feeder links at WRC-95.<sup>6</sup>

Insofar as the issue of MSS feeder links using FSS frequency bands is an important issue which concerns both FSS and MSS

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<sup>6</sup> Id. at ¶8.

operations, CWS fully agrees with the Commission that this issue should be included on the agenda for WRC-95. In this regard, we believe that it is vital that the November 1993 Radiocommunication Assembly give high priority to concluding the work underway within the Radiocommunication Sector and to initiating any new studies necessary to address MSS feeder-links in sufficient time for WRC-95. It appears that the feeder-link bandwidth requirements for future geostationary and non-geostationary MSS satellite systems can be quite large, ranging from 50 MHz to 200 MHz per satellite. Therefore, it is essential that the studies emanating from the Radiocommunication Sector, and future proposals to use FSS bands as feeder-links for MSS systems, fully demonstrate how the operators and users of FSS systems will be protected from harmful interference. Moreover, we believe that it would be in the public interest to consider alternative bands for MSS feeder-links in addition to FSS bands. CWS is prepared to participate to the fullest extent necessary to conclude this work in time for WRC-95.


#### CONCLUSION

The agenda for WRC-95 should include the two items designated by the APP-92 i.e. the report of the VGE and ways to facilitate the use of the MSS bands allocated at WARC-92, including feeder-link issues. The Radiocommunication Assembly should take steps to ensure that a full analysis is performed in

the interim before WRC-95 to determine the most suitable MSS feeder-link bands and to protect FSS systems. The United States should advocate ways to focus the work of the VGE and set forth a clear program and schedule that will provide the opportunity for all members to review the VGE's recommendations and understand the implications of proposed changes. To accomplish this, U.S. industry and the concerned government agencies must continue to work together within the U.S. preparatory process to support the work in the Radiocommunication Sector Study Groups.

Respectfully submitted,

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